SWEETWATER AUTHORITY



505 GARRETT AVENUE POST OFFICE BOX 2328 CHULA VISTA, CALIFORNIA 91912-2328 (619) 420-1413 FAX (619) 425-7469 http://www.sweetwater.org

September 20, 1999

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CALFED Bay-Delta Program 1416 Ninth Street, Suite 1155 Sacramento, CA 95814 Attention: Mr. Rick Breitenbach

Subject:

COMMENTS ON THE DRAFT PROGRAMMATIC ENVIRONMENTAL

IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT (PEIS/EIR)

Dear Mr. Breitenbach:

Sweetwater Authority is one of 23 member agencies of the San Diego County Water Authority. We have reviewed their preliminary comment letter on the draft PEIS/EIR and generally support their detailed comments. However, we would like to further emphasize key issues for Sweetwater Authority.

Sweetwater Authority owns and operates two reservoirs on the Sweetwater River and serves approximately 175,000 customers in the South Bay area of San Diego County. Our reservoirs are supplemented by two groundwater wells in National City and a number of alluvial and San Diego Formation wells which provide a source of poor quality groundwater to our reverse osmosis Demineralization Facility in the Lower Sweetwater River Basin. Sweetwater Authority is also involved in its own programs similar to some of the Bay-Delta elements: Water quality protection, ecosystem restoration, water use efficiency program, and watershed program. Sweetwater Authority uses its reservoirs to benefit its customers and the region by using off-peak storage opportunities for our agency. In turn, this decreases peak demands on the aqueducts and thus reduces the demand to pass water through the Delta.

Sweetwater Authority has spent millions of dollars developing and protecting local supplies. Conservation practices of our customers have resulted in one of the lowest consumption rates in California. The Authority imports an average of 40% of our supply annually, depending on the rainfall and groundwater production. Even with all of the reliability gained by our agency from investments in local water, we still need to import a portion of our water supply from the Colorado River or the State Water Project through San Diego County Water Authority, which is supplied by the Metropolitan Water District (MWD). In accordance with a directive from the Secretary of the Interior, California is attempting to reduce consumption of Colorado River water from the current 5.2 million

Mr. Rick Breitenback

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acre-feet per year (MAF) usage to subsist within its 4.4 MAF allotment. This will ultimately require additional supplies from the State Water Project.

The CALFED Bay-Delta preferred alternative gives no assurance of new water for the south. We believe that the proposed substantial financial investment in the Bay-Delta without provision for the storage or conveyance needs of the south is a flaw in the proposal and thereby in the analysis of impacts in the draft PEIS/EIR. Sweetwater Authority will not support a Bay-Delta plan lacking these provisions, nor, I believe, will the rest of the south, where the majority of the population and financial resources to support both the environmental and the water projects are located. We would like to work cooperatively with the other interests in the state to ensure that *all* of our needs are respected and met. As part of this effort, we strongly recommend the addition of guaranteed storage and conveyance to the preferred alternative analysis. The draft PEIS/EIR should analyze the approximate amount and general location of surface and groundwater storage necessary to achieve the reliability objective. As currently drafted, the PEIS/EIR does not address one of the objectives of the program adequately.

Please call me if you would like to further discuss our concerns.

Very truly yours,

SWEETWATER AUTHORITY

Richard A. Reynolds General Manager

RAR:TM:vls

pc: Sweetwater Authority Governing Board

San Diego County Water Authority Member Agencies, General Managers

Julie Maclay, San Diego County Water Authority